



March 16, 2010

Sustainable Communities Planning Grant and Incentives Program
 c/o The Department of Conservation, Office of Sustainability
 801 K Street, MS 24-01
 Sacramento, CA 95814

Esteemed Members and Staff of the Strategic Growth Council:

We offer our sincere gratitude for your extensive work to create and revise the Sustainable Communities Planning Grant and Incentives Program guidelines. The Council's openness to public input has been particularly appreciated.

Among the guidelines' strengths are its emphasis on the state's planning priorities, commitment to advancing the full range of benefits from good growth, and focus on reducing greenhouse gas emissions. To further support goals that we know the Council shares, we suggest the following four changes:

1. Fund local planning and local-regional collaboration to meet SB 375

California faces significant challenges: the foreclosure crisis, impending water shortages, childhood asthma and obesity, extensive commutes, traffic congestion, rising gas prices, and threats to our agricultural and natural heritage. Without strong local plans that are well-connected regionally, the state cannot address these challenges.

To achieve this goal, local governments need resources for their planning and participation in regional conversations, and regional agencies need resources for facilitating those conversations.

Adequately funding Focus Area #2 can ensure local planning and regional infrastructure align well, to meet the needs of all Californians. Therefore, we respectfully request that:

- Focus Area #2 should receive the majority of total planning grant funding (~80%).
- Of those funds, local applicants should receive the majority ($\geq 70\%$), and MPOs should receive approximately 30%.
- All applications must meet the full range of Council goals, and if eligible applications are not received, remaining funds can be shifted.
- MPOs should support, package, and prioritize local applications according to the Strategic Growth Council's grant criteria, for final review by the Council's committee.
- Local governments seeking funds under this focus area should submit their applications to the state, through the MPOs. The MPOs should then forward all applications received, but may rank applications based upon their conformity with regional plans and/or their evaluation of how well the plans meet the State's grant criteria. Regions' process for ranking proposals must be documented and transparent and submitted as part of the application package to the SGC.
- SB 375-related planning (Sustainable Communities Strategies / Alternative Planning Strategies) should be listed as an eligible activity.

2. Provide a 20 percent set-aside for disadvantaged communities

Across California there are hundreds of disadvantaged unincorporated and incorporated neighborhoods. They have been systematically excluded by growing cities, are underserved in the overall allocation of resources, and are frequently left out of local planning processes. Though they exist within the urban footprint, and are ideal locations for infill development and investment, infrastructure and community service deficits hinder their ability to accommodate the additional growth that would allow for smarter and more compact development.

The grant guidelines as written clearly intend to benefit disadvantaged communities. However, we have serious concern about whether they could ensure that funds address the most weighty and essential planning needs. Applications that address these issues face a distinct set of challenges and opportunities. Therefore, as in the Urban Greening grants, in addition to the extra points in the scoring criteria, we propose a small set-aside of 20% of the funds to support planning activities that specifically target and benefit disadvantaged communities, within each Focus Area. If qualified applications are not received, this money could roll over into the larger pool of resources.

3. Ensure change happens on the ground

The zoning code is where the rubber hits the road. Many excellent general plans espouse principles of walkability, mixed-use, and family-oriented neighborhoods, but the zoning codes fail to provide for sidewalks, separate commercial and residential uses, spread uses out from one another, and have low-density requirements resulting in schools that are too far away from families. We strongly recommend that no general plan, specific plan or climate action plan should be created or updated without the concurrent, consistent changes made to the zoning code, where applicable.

4. Create an advisory committee of stakeholders to review applications

Given the range of discretion and variety of objectives for these grants, we suggest the Council establish an advisory committee of stakeholders to help review applications and ensure expertise in the each of the SGC objective areas.

5. Use CalTrans grant language for sub-recipients

Nonprofits and universities can help local governments explore cutting-edge approaches that the jurisdiction might not otherwise consider, and the assistance of COGs and such entities will make it possible for local governments to participate who otherwise lack capacity. We strongly recommend that the Council mirror Caltrans' language in its successful Community-Based Planning Grant Program, and specify that COGs, educational institutions, and nonprofits are the eligible sub-recipients for these Sustainable Communities Planning Grants.

Thank you very much for your consideration.

Sincerely,

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